

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

FRANKLIN GRIMES,
*For himself and on behalf of all
similarly situated individuals,*

Plaintiff

v.

CASE NO. 3:08cv492(HEH)

**ADVANCED CALL CENTER TECHNOLOGY,
LLC,**

Defendant.

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS**

COMES NOW the Plaintiff, by counsel, and pursuant to Fed. R. Civ. P. 6(b), and moves the Court for an Enlargement of Time within which to respond to the Motion to Dismiss filed by Defendant, ADVANCED CALL CENTER TECHNOLOGY, LLC, through February 16, 2009, by reason of the following:

1. The undersigned counsel is responsible for the preparation of the response briefing in the above styled matter.
2. Plaintiff's counsel has been out of the state engaged in mediation in a California Federal class action case last week from January 29 through 30 and continuing this week from February 5 through 6.

Accordingly, counsel hereby requests an additional ten (10) days to respond to the Defendant's Motion.

Plaintiff represents that counsel for Defendant, Advanced Call Center Technology, LLC, has consented to such enlargement.

FRANKLIN GRIMES,
*For himself and on behalf of all
similarly situated individuals,*

_____/s/_____
Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Seth Abram Schaeffer, Esq.
McGuire Woods, LLP
One James Center
901 East Cary Street
Richmond, VA 23219
sschaeffer@mcguirewoods.com

_____/s/_____
Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net